

**THIRD DECLARATION OF STEPHEN W. MANNING, ESQ.**

I, Stephen W. Manning, declare as follows:

1. I am an attorney licensed to practice in the State of Oregon and am a member in good standing of the bars of the U.S. District Court for the District of Oregon, the U.S. Court of Appeals for the Ninth Circuit, and the Supreme Court of the United States. I am a member of the American Immigration Lawyers Association (AILA), a former member of the Board of Governors of AILA, and a former Chair of the Oregon Chapter of AILA. I am over 18 and have personal knowledge of the facts described herein.

2. I am the Executive Director of the Innovation Law Lab (“the Law Lab”), a nonprofit that I founded to improve the legal rights and well-being of immigrants and refugees by combining technology, data analysis, and legal representation.

3. I have previously submitted two declarations in this case.

4. The Law Lab maintains offices in several U.S. cities: Atlanta, Kansas City, Portland, Oakland, and San Diego.

5. The Law Lab’s Oakland office is located at the boundary between the cities of Oakland and Berkeley, CA and is managed by PJ Podesta, an Advocacy Coordinator with the Law Lab’s BorderX project—a project focused, in part, on building infrastructure for service providers in order to enable them to scale representation so that all noncitizens in removal proceedings have access to quality legal services. The Law Lab, through its BorderX project, provides nationwide infrastructural support to organizations and attorneys representing detained individuals, individuals seeking asylum and others. The BorderX project is an important component of the Law Lab as it directly advances our mission and organizational purpose of creating a scalable clearinghouse for immigrant justice.

6. As part of its strategic planning, the Law Lab has identified Northern California as one of the most important sites for deploying the clearinghouse approach and building an integrated immigrant legal services infrastructure. This is so for many reasons including because of the number of organizations providing immigrant legal services and the general availability of public funding to support legal services. When fully developed and implemented, the goal is that a noncitizen located anywhere in Northern California who is at risk of removal can contact any legal service provider and be “navigated” into the legal services delivery system. A central clearinghouse would manage the data and assign lawyers, social workers, and other service providers to the case as necessary to achieve a fair outcome at the San Francisco Immigration Court. The Law Lab opened its Oakland site to achieve, in part, this organizationally strategic initiative.

7. Law Lab is part of the Northern California group of organizations that includes the Justice and Diversity Center of the San Francisco Bar Association, the Northern California Collaborative for Immigrant Justice, Centro Legal de la Raza, the University of San Francisco Immigration Law Clinic, Community Legal Services in East Palo Alto, Central American Resource Center San Francisco, Freedom for Immigrants, and Pangea Legal Services, among others that is working to develop an integrated services model.

8. Mr. Podesta is focused on supporting the development of a clearinghouse infrastructure in Northern California. His work involves travel throughout the Bay Area, numerous engagements with partners in the area, and providing direct infrastructural support. For example, Mr. Podesta is tasked by the Law Lab with creating a universal intake procedure, in collaboration with the Justice and Diversity Center, for all of northern California. His work is location specific as it requires him to engage in direct observation of the current intake

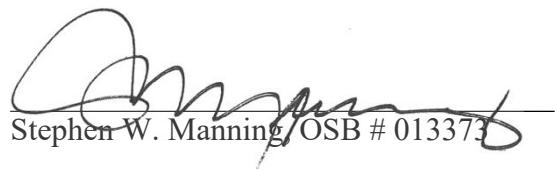
procedures throughout the region, direct observation of the practices and hearings at the San Francisco Immigration Court, numerous coalition meetings, direct observation of intakes at sites in Northern California such as in Yuba County, California. His work involves indexing the technological needs of the different participants who provide legal services, identifying how access to cloud technology and devices differs at the various geographic locations in Northern California such as the Yuba County jail, the San Francisco Immigration Court, and other locations where service providers engage in navigation and intake of noncitizens for legal services, and how providers and noncitizens use immigrant legal services throughout the Bay Area.

9. The Law Lab's on-the-ground work in Northern California includes a volunteer recruitment strategy focused on Bay Area service providers. Volunteer recruitment of lawyers, sponsors, activists, and technologists are an important component of Mr. Podesta's work in the Bay Area. It is because of the concentration of mission-aligned organizations that Mr. Podesta is able to recruit, train, and manage volunteers. These volunteers are important for the Law Lab model that relies on volunteers to provide infrastructural support to service providers working in Northern California by preparing research, collecting documents, and assisting in other ways. The Law Lab is currently onboarding a second-year law student who will work at the Oakland office for a summer clerkship in order to greater expand our work in the area.

10. The DHS's forcible return policy under the Migrant Protection Protocols has caused the Law Lab to miss several important milestones in the development of the clearinghouse infrastructure. For example, the design-development work for a courtwatch mobile software application for use by coalition partners has been delayed because Mr. Podesta was forced to shift his focus from his work in the Bay Area to the Law Lab's MPP response by

traveling to and from Tijuana, Mexico, working in Tijuana, and working remotely in order to facilitate the provision of Law Lab's legal services to persons affected by the MPP policy. Similarly, the deployment of an integrated online navigation portal for the Bay Area is behind schedule because Mr. Podesta was detailed to the Law Lab's response to the MPP's forcible return policy.

I hereby declare under the penalty of perjury pursuant to the laws of the United States that the above is true and correct to the best of my knowledge.



Stephen W. Manning OSB # 013375

EXECUTED this 3d day of March 2019.